

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

Application of )  
)  
)

NORTHERN PACIFIC AIRWAYS, INC. )

) Docket DOT-OST-2022-\_\_\_\_  
)  
)

For an exemption pursuant to 49 U.S.C. § 40109 and a )  
certificate of public convenience and necessity pursuant to )  
49 U.S.C. § 41102 (blanket Open Skies) )  
)

**APPLICATION OF NORTHERN PACIFIC AIRWAYS, INC.  
FOR AN EXEMPTION AND  
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY**

Communications with respect to this document should be addressed to:

Rob McKinney  
CEO  
Northern Pacific Airways, Inc.  
4700 Old International Airport Road  
Anchorage, Alaska 99502

Patrick R. Rizzi  
Robert E. Cohn  
HOGAN LOVELLS US LLP  
Columbia Square  
555 Thirteenth Street, NW  
Washington, DC 20004  
+1 202 637 5659/4999  
patrick.rizzi@hoganlovells.com  
robert.cohn@hoganlovells.com

Counsel for  
NORTHERN PACIFIC AIRWAYS, INC.

May 17, 2022

**NOTICE: Northern Pacific will be polling the U.S. carrier representatives on the attached service list and will provide the polling results to the Department upon completion.**

BEFORE THE  
DEPARTMENT OF TRANSPORTATION  
WASHINGTON, D.C.

	)	
Application of	)	
	)	
NORTHERN PACIFIC AIRWAYS, INC.	)	Docket DOT-OST-2022-____
	)	
For an exemption pursuant to 49 U.S.C. § 40109 and	)	
a certificate of public convenience and necessity	)	
pursuant to 49 U.S.C. § 41102 (blanket Open Skies)	)	May 17, 2022
	)	

**APPLICATION OF NORTHERN PACIFIC AIRWAYS, INC.  
FOR AN EXEMPTION AND  
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY**

Pursuant to 49 U.S.C. § 41102 and § 40109, 14 C.F.R. Part 302 (Subparts B and C), the Department's August 2005 Notice in Docket DOT-OST-2005-22228, and the Department's November 2007 Notice in Docket DOT-OST-2007-0084, Northern Pacific Airways, Inc. d/b/a Ravn Alaska ("Northern Pacific") hereby applies for exemption authority and a certificate of public convenience and necessity authorizing Northern Pacific to engage in scheduled foreign air transportation of persons, property, and mail between the United States and all countries with which the United States has an Open-Skies (or MALIAT) agreement that is being applied (including authority to operate via the United States and intermediate points to a point or points within these countries, and beyond, to the extent the applicable aviation agreement grants such rights). Northern Pacific also seeks blanket route integration authority.

Grant of this Application would be consistent with the Department's objectives to streamline the issuance of non-controversial authority that will maximize the ability of U.S. carriers to introduce convenient new air services, while minimizing administrative burdens on the Department and U.S. carrier applicants. Accordingly, Northern Pacific requests that its exemption authority and certificate authority be granted without delay, and remain in effect indefinitely, consistent with the blanket Open-Skies certificates and other open-entry certificates previously issued to U.S. carriers. See, e.g., DOT Orders 2007-7-3, 2007-4-19, 2007-4-2, 2007-4-27. Northern Pacific will poll on this Application and inform the Department of the polling results when completed.

In further support of this Application, Northern Pacific states as follows:

1. Northern Pacific is a corporation organized and existing pursuant to the laws of the State of Washington, with its principal office located at 4700 Old International Airport Road, Anchorage, Alaska 99502.

2. Northern Pacific is a citizen of the United States within the meaning of 49 U.S.C. § 40102(a)(15)(C), and is fit, willing, and able to perform the additional services for which it is applying, as the Department recently determined.

3. Northern Pacific holds a Certificate of Public Convenience and Necessity for Interstate Air Transportation, which was recently reissued in the name of Northern Pacific Airways, Inc. d/b/a Ravn Alaska by DOT Order 2021-11-3.

4. Northern Pacific requests that the Department take official notice, pursuant to Rule 24 of the Department's Rules of Practice, of all data and information on file with the Department to establish Northern Pacific's fitness.

5. Northern Pacific intends to start scheduled service between Anchorage, Alaska, on the one hand, and Korea and Japan, on the other hand, both of which are Open Skies partners of the United States, initially via a wet lease with a certificated U.S. air carrier and subsequently with its own crews and B-757 aircraft. Northern Pacific seeks the flexibility and breadth of blanket U.S. – Open-Skies certificate authority to encompass additional Open-Skies countries and to avoid the additional administrative burdens for itself and the Department of having to file future applications for other Open-Skies countries on a country-specific basis.

6. The requested authority is fully consistent with the existing and prospective Open-Skies agreements between the United States and its aviation trading partners. The Department has specifically invited U.S. carriers in the past to apply for blanket Open-Skies certificate authority covering services to countries with which Open-Skies agreements are currently being applied.<sup>1</sup> The requested authority is also fully consistent with and supported by Department precedent in which the Department has issued blanket Open-Skies certificates to numerous other U.S. carriers. See DOT Orders 2007-7-3, 2007-4-2, 2007-4-19, 2007-4-20, and 2007-4-27.

---

<sup>1</sup> See DOT Notice, In the Matter of Blanket Open-Skies Certificate Authority, April 3, 2007, Docket DOT-OST-2007-27790.

7. Grant of this Application is in the public interest. Prompt approval will enable Northern Pacific to begin offering convenient new services to the public between Anchorage and Open-Skies foreign points, including Korea and Japan – services that are consistent with existing and future bilateral and multilateral understandings with the United States’ aviation trading partners. Issuance of the requested exemption and certificate authority will enable Northern Pacific to offer consumers, tourists, and businesses with nonstop U.S. carrier service between Anchorage and these countries. The Department’s approval of this Application would also promote administrative efficiencies, consistent with the Department’s streamlining initiatives introduced in Docket DOT-OST-2005-22228.

8. Northern Pacific does not anticipate difficulty in obtaining fuel to operate these services.

WHEREFORE, Northern Pacific Airways, Inc. requests that the Department promptly grant the blanket Open-Skies exemption and certificate authority described herein, and grant such other and further relief as the Department deems to be in the public interest.

Respectfully submitted,



---

Patrick R. Rizzi  
Robert E. Cohn  
HOGAN LOVELLS US LLP  
Columbia Square  
555 Thirteenth Street, NW  
Washington, DC 20004  
+1 202 637 5659/4999  
patrick.rizzi@hoganlovells.com  
robert.cohn@hoganlovells.com  
Counsel for  
NORTHERN PACIFIC AIRWAYS, INC.

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application of Northern Pacific Airways, Inc. for an Exemption and a Certificate of Public Convenience and Necessity has been served this May 17, 2022, upon the following addressees:

Air Carrier	Name	Email Address
Alaska	David Heffernan	dheffernan@cozen.com
Allegiant	Aaron Goerlich	agoerlich@ggh-airlaw.com
American	Robert Wirick	robert.wirick@aa.com
American	John Williams	john.b.williams@aa.com
Amerijet	Roy Leon	rleon@amerijet.com
Atlas	Keinan Meginniss	keinan.meginniss@atlasair.com
Atlas	George Kopcsay	george.kopcsay@atlasair.com
Federal Express	Anne Bechdolt	anne.bechdolt@fedex.com
Federal Express	Brian Hedberg	brian.hedberg@fedex.com
Federal Express	Sandra Lunsford	slunsford@fedex.com
Frontier	Howard Diamond	howard.diamond@flyfrontier.com
Hawaiian	Parker Erkmann	perkmann@cooley.com
JetBlue	Robert Land	robert.land@jetblue.com
JetBlue	Reese Davidson	reese.davidson@jetblue.com
Kalitta Air	Mark Atwood	matwood@cozen.com
National Airlines	Malcolm Benge	mlbenge@zsrllaw.com
Polar Air Cargo	Kevin Montgomery	kevin.montgomery@polaraircargo.com
Southwest	Leslie Abbott	leslie.abbott@wnco.com
Spirit Airlines	David Kirstein	dkirstein@yklaw.com
Spirit Airlines	Joanne Young	jyoung@yklaw.com
Sun Country	Becky Karnitz	rebecca.karnitz@suncountry.com
United	Dan Weiss	dan.weiss@united.com
United	Steve Morrissey	steve.morrissey@united.com
United	Amna Arshad	amna.arshad@freshfields.com
UPS	Dontai Smalls	dsmalls@ups.com
UPS	Marina O'Brien	Marina.O'Brien@hklaw.com
UPS	Anita Mosner	Anita.Mosner@hklaw.com
	Benjamin Taylor	benjamin.taylor@dot.gov
	Robert Finamore	robert.finamore@dot.gov
	Brett Kruger	brett.kruger@dot.gov
	Kristen Gatlin	Kristen.gatlin@dot.gov
	Joseph Landart	joseph.landart@dot.gov
	Tricia Kubrin	tricia.kubrin@dot.gov
	Robert Carty	robert.carty@faa.gov
	David Williams	williamsds3@state.gov
	Info	<a href="mailto:info@airlineinfo.com">info@airlineinfo.com</a>

